As described in the Koba et al., patent (column 2 lines 64-68), the compensative means are located in the space to which the leakage magnetic field is reached (and acts to cause misconvergence). Nowhere do Koba et al., teach to place the means near the front conductor assembly, as recited in Claim 22. On the contrary, this location in Koba et al. is disclosed as being close to the rear part of the deflection unit (see Figures 6, 7, 8 and 9 and column 5 lines 25-28 and lines 60-61).

It is within the knowledge of the ordinary person skilled in the art that convergence of the beams is controlled by the rear part or the central part (along the longitudinal axis) of the deflection unit; whereas, geometry of the image is controlled by the **front part** of the deflection unit; see page 2 lines 25-32, page 3 lines 27-31, page 6 lines 8-17 of the above captioned patent application.

Moreover, core 29 of Koba et al., acts as a screen for the external opposition magnetic fields. Consequently, each of the first and second opposition magnetic fields can affect convergence only in the space where these fields can reach the beams that is in the region behind the core and not in a region located at the yoke exit. This is so because in the region located at the yoke exit it is too late or far in the path of the electron beam to act on the convergence of the beam. Thus, the Koba et al., arrangement does not teach to place a metal plate near the front conductor assembly as recited in Claim 22. It follows that Claim 22 is patentably distinguishable over Koba et al.

Claims 22, 5 and 6 were also rejected under USC 103(a) as being unpatentable over Hatte (FR2034201) in view of Barkow (US3721930). This rejection is, respectfully, traversed.

Barkow discloses a deflection yoke using a pair of horizontal and a pair of vertical deflection coils, one of which being saddle coils. The purpose of Barkow invention is the control convergence of the three electron beam and is not related to image geometry distortions. Barkow deflection yoke does not present any dissymmetry of either the coils structure or of the magnetic fields generated by the coils and acting on the electron beams.

The purpose of the Hatte invention is to locally modify the deflection fields to introduce a correction of trapezium distortion of the image. The Hatte patent describes a metal plate 3 placed between the tube neck and the deflection device to improve the trapezium situation. The Hatte patent does not teach anything about the location of the plate 3. Thus, the Hatte patent is silent about the location where the magnetic field is modified by such a plate. On the contrary, by reference to the drawing, the plate 3 appears to be located in the middle of the deflection yoke. The placement of plate 3 in the middle of the deflection yoke causes plate 3 to modify the fields of the complete deflection yoke. Thereby, plate 3 affects coma, convergence and geometry of the image created on the tube screen.

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Claim 22, unlike each of Barkow and Hatte, is directed to solving the cross modulation effects that can cause either orthogonality or parallelogram distortions. Claim 22 recites metal plate which is located near the front conductor assembly (See figures 5,6 and 7 and page 6 lines 37-40, page 7 lines 1-17). By placing the metal plate near the front conductor assembly, in a way that is different from that in each of Barkow and Hatte, the arrangement of Claim 22 is, advantageously, capable of solving the cross modulation effects without modifying the beam convergence or coma parameters. Neither Hatte nor Barkow suggests placing the metal plate near the front conductor assembly. Therefore, the combination of them cannot suggest placing the metal plate near the front conductor assembly, as recited in Claim 22. For these reasons claims 22, 5 and 6 are patentably distinguishable over each of Hatte and Barkow and over a combination thereof.

Figure 6 of the drawings has been amended to remove reference numeral 42.

RCA 89 342 Serial No. 09/454,875

Allowance of Claims 5-7 and 22, is respectfully requested.

Respectfully submitted,

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